

**INTERNAL PROCEDURE**  
**Handling Company Requests to Adjust Quarterly Quality of Service Report Results**

**PURPOSE**

The purpose of this procedure is to provide Commission Staff members with a uniform procedure for handling matters regarding a company request to adjust its quarterly quality of service report results.

**OBJECTIVE**

Commission rules pertaining to the quarterly submission of telecommunications quality of service reports allow a company to request approval to make certain adjustments to the company's results. According to 4 CSR 240-32.080(5) subsection (A) (orders for basic local telecommunications service), (B) (installation commitments), and (H)(3) (repair commitments) a company may request a specific exception and have it approved by the Commission Staff to address a unique situation or condition. The practical effect of such requests is to exclude certain orders in the compilation of a company's results. Such requests are generally intended to reflect events beyond the control of the company that may have caused the company to fail to achieve the established service objectives.

**Internal Procedure for Handling Requests to Adjust Quality of Service Results:**

1. All requests and inquiries pertaining to telecommunications quarterly quality of service reports should be directed to a Technical Services Specialist within the Telecommunications Department or the Manager of the Telecommunications Department.
2. A company will be required to provide, in writing, the information requested in the attached form that is available either through the Commission's Electronic Filing and Information System or the Missouri Commission's web site. The form can be mailed, faxed or submitted electronically.
3. Staff will contact the company as to whether their request is approved or denied. The Staff person will maintain a record of the request along with whether the request was approved or denied.

### **Guidelines for Determining Approval:**

A request to adjust a company's quality of service results should generally be dependent upon whether an event or situation is beyond the control of the company. Existing Commission rules already provide some guidance as to acceptable reasons for adjusting a company's quality of service results. For example 4 CSR 240-32.080 (5) (A) and (B) identify that service installation delays caused by the customer or a declared natural disaster are excludable. The company does not need to seek approval to exclude such orders. If the company requests to exclude certain orders based on other criteria, the company will need to seek approval from the Commission Staff. The following additional types of requests will be granted but only for the orders directly affected:

- a.) Any order where the company has been denied access to an area necessary to install or repair service.
- b.) Any order where the installation and/or repair of service places the worker in an unsafe situation. Such situations include, but are not limited to, where the worker may have to work in an area where a power line has gone down on telephone lines, flooded area, an unsafe building, or it appears the National Electric Safety Code may be violated.

Other types of requests may be granted; however to attempt to further clarify what should be allowed and what should not be allowed, the following types of requests will not be granted for exclusion in the company's quality service report:

- a.) Delay created because company needed to build out its existing plant.
- b.) Delay caused by failure in the company's computer or mechanized systems involved in processing orders.
- c.) Delay caused by a formal strike or work stoppage of the company's workers.<sup>1</sup>

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<sup>1</sup> The Company should still report performance in the event of a strike. If performance falls below the Commission's surveillance level the Company should indicate the dates of the strike in the submission of its quarterly quality of service report,.

### **Form to Exclude Orders in the Tabulation of a Company's Quality of Service Results**

This form is to request permission to further adjust quality of service results as is otherwise contemplated by Commission rule 4 CSR 240-32.

**Company:** \_\_\_\_\_ **Date submitted** \_\_\_\_\_

**Reason for excluding certain orders** (check & explain, as appropriate):

\_\_\_ the company has been denied access to an area necessary to install or repair service.  
Explain:

\_\_\_ the installation and/or repair of service places the worker in an unsafe situation.  
Explain:

\_\_\_ Other reason.  
Explain:

**Additional Information:**

Geographic area affected:

Dates of when orders would be excluded:

Number of orders affected:

Quality of Service area impacted:

Quality of Service result prior to excluding orders:

Quality of Service result after excluding orders:

Name, address and phone number of company official requesting the exclusion:

**Questions and the submission of this form can be directed to either:**

Larry Henderson at (573) 751-8519 (<mailto:larry.Henderson@psc.mo.gov>) or Mick Johnson (573) 751-8496 (<mailto:mick.Johnson@psc.mo.gov>); Fax: (573) 751-5525; 201 Madison St., Jefferson City, MO 65102.